

1 WRIGHT, FINLAY & ZAK, LLP
2 Matthew S. Carter, Esq.
3 Nevada Bar No. 9524
4 Lindsay D. Robbins, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
(702) 475-7964; Fax: (702) 946-1345
lrobbins@wrightlegal.net

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9 *Attorneys for Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee, on Behalf*
10 *of the Holders of the Accredited Mortgage Loan Trust 2004-3 Asset-Backed Notes*

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS INDENTURE TRUSTEE,
ON BEHALF OF THE HOLDERS OF THE
ACCREDITED MORTGAGE LOAN TRUST
2004-3 ASSET BACKED NOTES,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE INSURANCE
COMPANY and CHICAGO TITLE
INSURANCE COMPANY,

Defendants.

Case No.: 2:19-cv-00409-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD FOR
DEUTSCHE BANK TO RESPOND TO
CHICAGO TITLE'S MOTION TO
DISMISS [ECF No. 23]**

(First Request)

COMES NOW Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee,
on Behalf of the Holders of the Accredited Mortgage Loan Trust 2004-3 Asset-Backed Notes
("Deutsche Bank") and Defendant Chicago Title Insurance Company ("Chicago") (collectively,
the "Parties"), by and through their counsel of record, hereby agree and stipulate as follows.

1. On November 22, 2019, Chicago filed a Motion to Dismiss [ECF No. 23];
2. Deutsche Bank's response to Chicago's Motion is due December 6, 2019;

- 1 3. Deutsche Bank's counsel is requesting an additional twenty-eight (28) days to file its
2 response to Chicago's Motion, and thus requests up to January 3, 2020, to file its
3 Opposition;¹
- 4 4. This extension is requested to allow Counsel for Deutsche Bank additional time to
5 review and respond to the points and authorities cited to in Chicago's Motion;
- 6 5. Counsel for Chicago does not oppose the extension; and

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25 ¹ The Parties intend on filing a Stipulation to Stay Litigation pending the appeal to the Ninth
26 Circuit Court of Appeals in a related matter, entitled *Wells Fargo Bank, N.A. v. Fidelity National*
27 *Title Ins. Co.*, Ninth Cir. Case No. 19-17332 (District Court Case No. 3:19-cv-00241-MMD-
28 WGC), which would also stay Deutsche Bank's deadline to respond to Chicago's Motion. The
instant Stipulation is being submitted in the event the Court does not enter a ruling on the
Stipulation to Stay prior to Deutsche Bank's deadline to respond to Chicago's Motion to
Dismiss.

1 6. This is the first request for an extension which is made in good faith and not for
2 purposes of delay.

3 **IT IS SO STIPULATED.**

4 DATED this 26th day of November, 2019.

5 **WRIGHT, FINLAY & ZAK, LLP**

6 /s/ Lindsay D. Robbins

7 Lindsay D. Robbins, Esq.
8 Nevada Bar No. 13474
9 7785 W. Sahara Ave., Suite 200
10 Las Vegas, NV 89117
11 *Attorney for Plaintiff Deutsche Bank National
12 Trust Company, as Indenture Trustee, on
13 Behalf of the Holders of the Accredited
14 Mortgage Loan Trust 2004-3 Asset-Backed
15 Notes*

16 DATED this 26th day of November, 2019.

17 **EARLY SULLIVAN WRIGHT GIZER &
18 McRAE LLP**

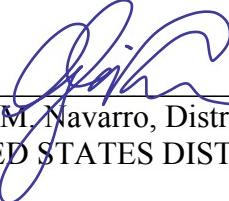
19 /s/ Kevin S. Sinclair

20 Kevin S. Sinclair, Esq.
21 Nevada Bar No. 12277
22 Sophia S. Lau, Esq.
23 Nevada Bar No. 13365
24 8716 Spanish Ridge Avenue, Suite 105
25 Las Vegas, Nevada 89148
26 *Attorneys for Defendants, Fidelity National
27 Title Insurance Company and Chicago Title
28 Insurance Company*

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17 **ORDER**

18 **IT IS HEREBY ORDERED** that the above Stipulation to Extend Time Period,
19 (ECF No. 26), for Deutsche Bank to Respond to Chicago Title's Motion to Dismiss is
20 **GRANTED.**

21 Dated this 26 day of November, 2019.

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24 Gloria M. Navarro, District Judge
25 UNITED STATES DISTRICT COURT